

EXHIBIT A

4. I am an attorney licensed to practice in the State of Texas and am a member of the bar of the United States District Court for the Southern District of Texas. I am currently managing attorney for the litigation department of the law firm of Mackie Wolf Zientz & Mann, P.C. (MWZM), with offices located in Dallas, Texas and Houston, Texas. I am in good standing with respect to the State Bar of Texas. A true and correct copy of my resume is attached hereto as **Exhibit A-1**.

5. MWZM was retained by Plaintiff to file this lawsuit to enforce Plaintiff's interest in certain real property as a result of a default under the loan agreement. The legal professionals of MWZM with whom I worked in providing these services are at all relevant times attorneys licensed by the State of Texas, in good standing and experienced in the areas of business, real estate, and commercial litigation practice. Without waiving the attorney-client privilege, the subject matter of the counsel and representation provided to Plaintiff by MWZM legal professionals included, but was not limited to: review and analysis of the loan documents at issue; review and analysis of the history of this matter; preparation and filing of the original complaint; completing service; drafting a request for entry of default; drafting a motion for default judgment; and conducting legal research. These activities are set forth in chronological order by name and date on the invoices included with the motion as **Exhibit A-2**. The hours set forth for each activity were actually expended on the topics stated.

6. The reasonable incurred attorneys' fees are \$10,907.70 in filing and prosecuting its Plaintiff's claims to enforce its interest in certain real property as a result of the default under the loan agreement between the parties. The hourly rate charged is \$215.00 per hour for attorneys and \$95.00 per hour for paralegals and legal assistants.

7. I have become familiar with the legal services necessary to handle claims based on and the reasonable charges for such legal services in the United States District Court for the Southern District of Texas and within the State of Texas.

8. In considering reasonable attorneys' fees in this case, I have considered the time and labor involved; the difficulty of the issues presented; the experience, reputation, and ability of the attorneys involved in pursuing the claims; the skills requisite to properly conduct the case; customary charges of the Bar and awards in similar cases; and the amount in controversy.

9. Based upon my knowledge and experience with similar litigation in the state and federal courts in Texas over the last ten years, and applying the facts and factors set out above, it is my opinion that the hourly rate of up to \$215.00 per hour for attorneys and \$95.00 per hour for paralegals and legal assistants are reasonable and customary, and the sum of \$10,907.70 is reasonable attorneys' fees for prosecuting Plaintiff's claims for the enforcement of its interest in certain real property as a result of a default of under the loan agreement.

10. If any party files post-judgment motion, a reasonable fee for Plaintiff would be \$2,500.00. If this case is appealed to the Fifth Circuit Court of Appeals, a reasonable fee for the Plaintiff would be an additional \$5,000.00."

FURTHER DECLARANT SAYETH NAUGHT.

Signed this January 11, 2021.

A handwritten signature in black ink, appearing to read 'Mark D. Cronenwett', written in a cursive style.

MARK D. CRONENWETT

EXHIBIT A-1

MARK D. CRONENWETT

14160 N. Dallas Parkway, Suite 900 • Dallas, Texas 75254 • (214) 635-2650

PROFESSIONAL EXPERIENCE

Mackie Wolf Zientz & Mann, P.C., Dallas, Texas, 10/12-present

Practice areas: consumer law, primarily mortgage-lending litigation; general commercial litigation; general insurance defense; and appellate law. My duties include handling all aspects of a litigation practice, including discovery, motion practice and sitting first chair at trial. Another major aspect of my practice involves briefing issues to all Texas appellate courts, both in original proceedings and in the appeal of final judgments. I also have the responsibility of giving work to associate attorneys at the firm and supervising them.

Higier Allen & Lautin, P.C., Addison, Texas, 1/09-10/12

Practice areas: consumer law, primarily mortgage-lending litigation; general commercial litigation; general insurance defense; and appellate law. My duties include handling all aspects of a litigation practice, including discovery, motion practice and sitting first chair at trial. Another major aspect of my practice involves briefing issues to all Texas appellate courts, both in original proceedings and in the appeal of final judgments. I also have the responsibility of giving work to associate attorneys at the firm and supervising them.

Cowles & Thompson, P.C., Dallas, Texas, 9/99-1/09

I was an associate until I was made a Shareholder in December 2000. Practice areas: consumer law, primarily mortgage-lending litigation; general commercial litigation; general insurance defense; and appellate law. My duties include handling all aspects of a litigation practice, including discovery, motion practice and sitting first chair at trial. Another major aspect of my practice involves briefing issues to all Texas appellate courts, both in original proceedings and in the appeal of final judgments. I also have the responsibility of giving work to associate attorneys at the firm and supervising them.

Fanning, Harper & Martinson, P.C., Dallas, Texas 9/98-9/99

I was an associate in the firm's governmental defense section. Practice areas: defense of governmental entities in civil rights and employment cases. My duties included sitting second chair at trial; drafting and answering discovery; drafting and arguing all varieties of motions; drafting appellate briefs; and attending mediations.

Kuntz & Bonesio, L.L.P., Dallas, Texas 6/97-9/98

I was a litigation associate. Practice areas: commercial litigation, general insurance defense, employment law, and insurance subrogation. My duties included sitting second chair at trial; drafting and answering discovery; drafting and arguing all varieties of motions.

Texas Court of Appeals, Tenth District, Waco, Texas, 10/94-6/97

I was a briefing attorney for Judge Bob Cummings until July 1996 when I was hired as Judge Cummings' permanent staff attorney. I was the principal legal advisor to Judge Cummings; researched and drafted opinions in complex appeals; consulted with other judges on reconciling differences on the correct application of law; prepared drafts of opinions reconciling differences; led discussions of cases at court conferences; supervised interns and more junior legal staff; and handled the Court's motions docket.

Texas Employment Commission, Austin, Texas 1/94-10/94

I was a hearing officer, presiding over administrative hearings concerning unemployment compensation and issued written opinions.

EDUCATION

Juris Doctorate, 5/93

Catholic University of America, Washington D.C.

Associate Moot Court member, 1/91-5/93

Finalist, Dean's Cup Moot Court Competition, 3/91

President and Secretary of Guild of Catholic Lawyers, 5/91-5/93

B.A. in English Literature, concentrating in Politics, 5/90
University of Dallas, Irving, Texas

PROFESSIONAL
ASSOCIATIONS

Admitted to Texas State Bar, Fifth Circuit, and all Texas Federal District Courts;
Member of the Dallas Bar Association; Consumer Law and Civil Appellate Sections of
the Texas Bar; Federal Bar Association; Immediate Past President, St. Thomas More
Society; Pro Bono Counsel to White Rose Women's Center

EXHIBIT A-2

Invoice Date

10/25/2019

Invoice Number

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: [REDACTED]
 Reference:
 Property Addr: 2812 DEVON DR
 CORPUS CHRISTI, TX 78404
 Our File: 19-000244-671-2

Loan Type: HEL; Case Type: Litigation; Filing Date: ; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
10/11/2019	Senior Attorney Fee-Hourly- Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Review new matter.					
10/14/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review upcoming deadline to file suit.					
10/14/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to correspondence for foreclosure.					
10/14/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review change in foreclosure status.					
10/15/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.50	\$107.50
Conduct initial review of file to determine next steps.					
10/15/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Request heirship report on deceased borrowers.					
10/17/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.60	\$129.00
Assemble loan documents for preparing lawsuit.					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$446.50
Current Amount Due	\$446.50
Payments Received	\$0.00
Total Amount Due	\$446.50

Invoice Date

11/12/2019

Invoice Number

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: XXXXXXXXXX
 Reference:
 Property Addr: 2812 DEVON DR
 CORPUS CHRISTI, TX 78404
 Our File: 19-000244-671-2

Loan Type: HEL; Case Type: Litigation; Filing Date: ; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
11/01/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to deadline to file suit - pending receipt of heirship report from investigator.					
11/06/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Prepare synopsis of litigation status for next steps.					
11/06/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.40	\$38.00
Attention to completing correspondence regarding deceased borrower issue.					
11/07/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review file documents for deceased borrower proof.					
11/07/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.10	\$21.50
Review status of heirship report.					
11/07/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt, review, and provide deceased borrower report.					
11/08/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to correspondence from foreclosure.					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$250.50
Current Amount Due	\$250.50
Previous Balance	\$446.50
Payments Received	\$0.00
Total Amount Due	\$697.00

Invoice Date

12/10/2019

Invoice Number

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: [REDACTED]

Reference:

Property Addr: 2812 DEVON DR
 CORPUS CHRISTI, TX 78404
 Our File: 19-000244-671-2

Loan Type: HEL; Case Type: Litigation; Filing Date: ; Chapter: NO

BILLING SUMMARY:

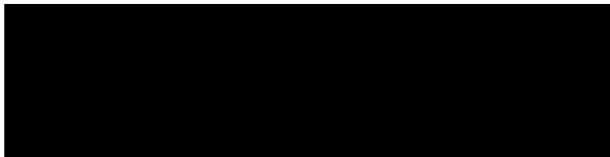
COSTS			
DATE	COST DESCRIPTION	RECOVERABLE	AMOUNT
11/27/2019	Process Server Costs- Recoverable	Yes	\$389.70
12/06/2019	Court Costs for filing complaint.- Recoverable	Yes	\$400.00

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
11/14/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Attention to completing additional correspondence regarding pending heir ship report.					
11/15/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to status of heirship report.					
11/24/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review for status of heirship report.					
11/27/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.50	\$107.50
Receipt and review of heirship report and associated findings.					
11/27/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.80	\$172.00
Prepare underwriter approval letter and submit to fidelity.					
11/27/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	1.30	\$279.50
Draft original complaint and request preparation for filing.					
11/27/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Draft certificate of interested parties.					
11/29/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to correspondence from underwriter.					
11/29/2019	Paralegal Fee-Hourly-	Yes	\$95.00	0.40	\$38.00

11/29/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.50	\$47.50
Drafted request for summons to be issued.					
11/29/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
prepared request for summons for Original complaint.					
11/29/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	1.20	\$114.00
Prepared and redacted exhibits for original complaint.					
11/29/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review documents prepared for filing and provide feedback.					
12/02/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Receipt and review of signed underwriter approval letter.					
12/04/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review steps completed, status of submitting complaint for filing, and prepare case status report for next steps in litigation .					
12/06/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Revised exhibits. notified attorney.					
12/06/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review exhibits for filing.					
12/09/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review order for conference and relevant instructions provided by the court.					
12/09/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Receipt, review, and process Order for conference.					

TOTALS

DESCRIPTION	AMOUNT
Total Costs Since Last Billing	\$789.70
Total Hourly Fees Since Last Billing	\$1,336.00
Current Amount Due	\$2,125.70
Previous Balance	\$697.00
Payments Received	\$446.50
Total Amount Due	\$2,376.20



Invoice Date

03/16/2020

Invoice Number

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: [REDACTED]
 Reference:
 Property Addr: 2812 DEVON DR
 CORPUS CHRISTI, TX 78404
 Our File: 19-000244-671-2

MWZM Case No.: 19-000244-671-2; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

BILLING SUMMARY:

COSTS			
DATE	COST DESCRIPTION	RECOVERABLE	AMOUNT
12/21/2019	Process Server Costs- Recoverable	Yes	\$162.00
12/28/2019	Process Server Costs- Recoverable	Yes	\$102.00
01/04/2020	Process Server Costs- Recoverable	Yes	\$102.00

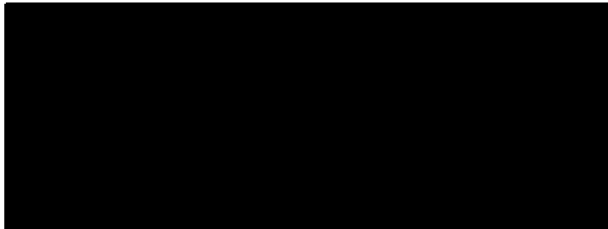
HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
12/06/2019	Senior Attorney Fee-Hourly- Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review complaint.					
12/11/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review status of citations.					
12/11/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Correspondence requesting a copy of issued summons.					
12/16/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.80	\$76.00
Receipt, review, and processed incoming summons issued by district clerk on defendant Patricia, Theresa, Michael, and Daniel Previty.					
12/16/2019	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.40	\$38.00
Correspondence to complete personal service on all Defendants.					
12/26/2019	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to correspondence from foreclosure.					
12/27/2019	Paralegal Fee-Hourly- Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.40	\$38.00
Lengthy teleconference with two named Defendants regarding lawsuit and summons received					
	Paralegal Fee-Hourly-				

12/27/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review notes regarding correspondence with heirs.					
12/31/2019	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review file, notes, deadlines, and prepare case status update.					
12/31/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Review and confirm completion of personal service on defendant Michael Previt.					
12/31/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
receipt and review 1st and 2nd service attempts on Patricia Previt					
12/31/2019	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Review and confirm completion of personal service on defendant Daniel Previt.					
01/02/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Receipt and review change in foreclosure status due to loss mitigation hold.					
01/06/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Receipt and review 3rd and 4th attempt of service on defendant Patricia Previt.					
01/06/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Review and correspond proper proof of service for Defendant Daniel Previt.					
01/06/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Prepared return of service for filing.					
01/15/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.40	\$38.00
Receipt and review return of service on defendant Daniel and Michael Previt.					
01/15/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Correspondence requesting return of services to be filed.					
01/15/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to notice of service.					
01/15/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review status of service					
01/23/2020	Paralegal Fee-Hourly-Recoverable Duncan-Abraham, Janie	Yes	\$95.00	0.20	\$19.00
Receive and review correspondence from process server regarding attempted service on Patricia Previt. Correspondence regarding same.					
01/23/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Evaluate process server's notes for next steps.					
01/23/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Attention to calling defendant's attorney Christopher Dorsey, phone number 361-850-0076					
01/23/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Correspondence requesting an affidavit that stipulates all findings of service on defendant Patricia Previt.					
02/23/2020	Associate Attorney Fee-Hourly-	Yes	\$215.00	0.20	\$43.00

03/02/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.10	\$21.50
Attention to calendared deadline.					
03/02/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.50	\$107.50
Prepare motion to abate and submit for filing.					
03/02/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Prepared Motion to Abate and order for filing.					
03/02/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review affidavit of diligent effort on defendant Patricia Previty.					
03/06/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Telephonic conversation with heirs regarding new motion filed and whether they should be concerned.					

TOTALS

DESCRIPTION	AMOUNT
Total Costs Since Last Billing	\$366.00
Total Hourly Fees Since Last Billing	\$1,201.00
Current Amount Due	\$1,567.00
Previous Balance	\$2,822.70
Payments Received	\$2,822.70
Total Amount Due	\$1,567.00



Invoice Date

04/17/2020

Invoice Number

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: [REDACTED]

Reference:

Property Addr: 2812 DEVON DR
 CORPUS CHRISTI, TX 78404
 Our File: 19-000244-671-2

MWZM Case No.: 19-000244-671-2; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

BILLING SUMMARY:

COSTS			
DATE	COST DESCRIPTION	RECOVERABLE	AMOUNT
03/07/2020	Process Server Costs- Recoverable	Yes	\$162.00

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
03/16/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review notification from court.					
03/16/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Receipt and review executed order to Abate case. notified attorney.					
03/16/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review notice of resetting hearing.					
03/16/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review court's order granting abatement of matter.					
03/16/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review notice of resetting initial conference.					
03/20/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Attention to completing correspondence regarding original petition being filed.					
03/24/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Attention to completing correspondence regarding status of pending service completion.					
03/30/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.40	\$86.00
Review file, status of service, status of hold, and prepare case notes for next steps in litigation.					
04/07/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50

Draft motion for substitute service on Patricia Previty.					
04/07/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Draft proposed order for service on Patricia Previty.					
04/07/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Draft declaration to be signed by Janie Abraham.					
04/07/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review for Theresa's status of service.					
04/08/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Revise and finalize exhibits for motion for substitute service and submit for preparation for filing.					
04/10/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Review and correspond requesting status of service on defendant Theresa Lopez.					
04/10/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Review, correspond and notify attorney of pending service on Theresa Lopez.					
04/10/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review public records and find alternate serving address for Theresa Lopez.					
04/10/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review new address to completion of service on Theresa Lopez.					
04/10/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Provided detailed instructions to push service forward.					
04/13/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.50	\$47.50
Prepared exhibits in support of motion for substitute service on defendant Patricia Previty.					
04/13/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review documents prepared for motion for substitute service.					
04/14/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Prepared motion for substitute service and supporting documents for filing.					
04/15/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Review and confirm completion of personal service by process server on defendant Theresa Lopez.					

TOTALS

DESCRIPTION	AMOUNT
Total Costs Since Last Billing	\$162.00
Total Hourly Fees Since Last Billing	\$1,016.00
Current Amount Due	\$1,178.00
Previous Balance	\$4,389.70
Payments Received	\$2,822.70
Total Amount Due	\$2,745.00

Invoice Date

06/10/2020

Invoice Number

Mackie Wolf Zientz & Mann, P.C.
 14160 Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: [REDACTED]
 Reference:
 Property Addr: 2812 DEVON DR
 CORPUS CHRISTI, TX 78404
 Our File: 19-000244-671-2

MWZM Case No.: 19-000244-671-2; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

BILLING SUMMARY:

COSTS			
DATE	COST DESCRIPTION	RECOVERABLE	AMOUNT
04/14/2020	Process Server Costs- Recoverable	Yes	\$162.00
04/25/2020	Process Server Costs- Recoverable	Yes	\$163.50

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
04/20/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Telephonic correspondence with Theresa Lopez regarding her lack of relationship to her parents/ no interest in the property. She will be send a her answer to the suit shortly.					
04/20/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review letter of non interest from defendant Teresa Lopez. notified attorney.					
04/20/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review correspondence submitted by defendant Teresa disclaiming any interest in property.					
04/22/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Attention to completing review for aged project.					
04/23/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review executed order granting motion for substitute service on defendant Patricia Prevyty.					
04/23/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Correspondence requesting substitute service to be completed on Patricia Prevyty.					
04/23/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review court's order granting motion for service.					
04/27/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Review and confirm completion of personal service by process server on defendant Patricia Prevyty.					

05/01/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.40	\$86.00
Review status of service, upcoming deadlines and prepare notes for next steps in litigation.					
05/04/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review return of service on defendant Patricia Previty.					
05/25/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.60	\$129.00
Draft motion for entry of order of no interest and proposed order.					
05/25/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review status of litigation and prepare case notes for update.					
05/26/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	1.00	\$215.00
Draft motion for default judgment against defendants.					
05/26/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.40	\$86.00
Draft proposed final judgment.					
05/26/2020	Paralegal Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.50	\$107.50
Draft request for clerk's entry of default.					
05/26/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.40	\$86.00
Draft declaration of military service.					
05/29/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.40	\$38.00
Prepared exhibits in support of Motion for entry of order of non interest.					
05/29/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Requested military and bankruptcy searches.					
05/29/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review agreed order prepared for filing.					
05/29/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Receipt and review military and bankruptcy search results.					
05/29/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.60	\$57.00
Prepared and redacted exhibits in support of motion for default judgment.					
05/29/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review exhibits prepared for filing with motion for default judgment.					
06/03/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Attention to completing correspondence regarding completion of service on all defendants.					
06/05/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Prepare Motion for default judgment and motion of non interest for federal filing.					
06/05/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review status of default judgment.					

TOTALS

DESCRIPTION	AMOUNT
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Previous Balance	\$5,567.70
Payments Received	\$5,567.70
Total Amount Due	\$1,735.00



Invoice Date

07/21/2020

Invoice Number

Mackie Wolf Zientz & Mann, P.C.
 14160 Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: [REDACTED]
 Reference:
 Property Addr: 2812 DEVON DR
 CORPUS CHRISTI, TX 78404
 Our File: 19-000244-671-2

MWZM Case No.: 19-000244-671-2; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
06/10/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Attention to completing correspondence regarding monitoring for execution of motion for default.					
06/15/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review standing COVID-19 orders on court's website in anticipation of upcoming hearing.					
06/15/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Contact case manager to inquire about upcoming hearing - email for zoom/telephone information will be provided the day before the hearing.					
06/15/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review clerk's notice of cancelling initial conference.					
06/18/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Receipt and review of notice of entry of default and order by judge from court clerk.					
06/22/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review filed stamped executed order.					
07/08/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.80	\$172.00
Pursuant to court's instructions, draft new motion for default judgment against defendants and submit for filing.					
07/14/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Requested Military and bankruptcy searches.					
07/14/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review military and bankruptcy search results.					
07/14/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00

Drafted Correspondence providing notice of default filing.

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$532.00
Current Amount Due	\$532.00
Previous Balance	\$7,302.70
Payments Received	\$7,302.70
Total Amount Due	\$532.00



Invoice Date

09/23/2020

Invoice Number

Mackie Wolf Zientz & Mann, P.C.
 14160 Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: [REDACTED]
 Reference:
 Property Addr: 2812 DEVON DR
 CORPUS CHRISTI, TX 78404
 Our File: 19-000244-671-2

MWZM Case No.: 19-000244-671-2; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
07/23/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review status of litigation and prepare notes for next steps.					
08/10/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Attention to completing correspondence regarding pending executed order on our Motion for default judgment.					
08/14/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review docket report for status of default judgment motion and prepare case notes for next steps.					
08/17/2020	Associate Attorney Fee-Hourly- Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review status of motion for default judgment.					
08/21/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review request for litigation fees					
08/21/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.40	\$38.00
Prepared outstanding litigation fees and cost.					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$236.00
Current Amount Due	\$236.00
Previous Balance	\$7,834.70
Payments Received	\$7,834.70
Total Amount Due	\$236.00

Invoice Date

11/30/2020

Invoice Number

Mackie Wolf Zientz & Mann, P.C.
 14160 Dallas Pkwy Ste. 900
 Dallas, TX 75254
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 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: XXXXXXXXXX
 Reference:
 Property Addr: 2812 DEVON DR
 CORPUS CHRISTI, TX 78404
 Our File: 19-000244-671-2

MWZM Case No.: 19-000244-671-2; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

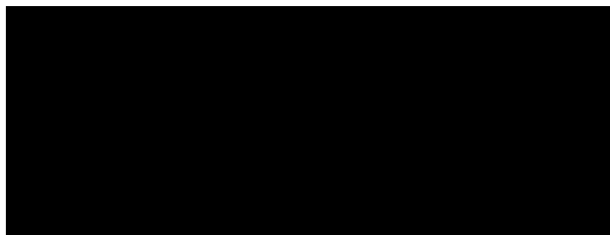
BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
08/27/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.20	\$43.00
Review docket report for status of default judgment against defendants.					
09/24/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review status of default judgment and email court case manager to follow up on MDJ					
10/21/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Review and correspond regarding pending judgment and attorney follow up.					
10/30/2020	Associate Attorney Fee-Hourly-Recoverable Hessami, Samin	Yes	\$215.00	0.30	\$64.50
Review status of loan, litigation, and update case notes.					
11/09/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.30	\$64.50
Review case docket to monitor default judgment and update case notes.					
11/16/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.30	\$64.50
Review case docket and correspondence by email with the court's case manager regarding the entering of the default judgment.					
11/16/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.20	\$43.00
Receive and review correspondence from the court's case manager.					
11/16/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.60	\$129.00
Began drafting Supplement to Motion for Default Judgment to fulfill court's request.					
11/18/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.60	\$129.00
Conduct brief legal research on case law to cite in support to the supplement of the motion for default judgment and review local rules to determine best action in response to the court's request.					
11/18/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	1.20	\$258.00

11/19/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Requested military and bankruptcy searches.					
11/19/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Drafted cover letter in support of Supplement motion being filed.					
11/19/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review military and bankruptcy search results.					
11/19/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Prepared supplement motion for default for federal filing.					
11/19/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review executed order denying Non interest of property for defendant Theresa Lopez. notified attorney.					
11/19/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.20	\$43.00
Receive and review order denying motion for agreed order (Teresa Lopez).					
11/19/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review and revise status of default judgment.					
11/20/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.20	\$43.00
Correspondence with court's staff regarding supplement to motion for default judgment filed on 11/19/20.					
11/20/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.50	\$107.50
Review order denying motion for agreed order with Defendant Theresa Lopez and research to determine next steps.					
11/24/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.20	\$43.00
Receipt and review email from the case manager regarding submission of the supplement to the judge.					
11/24/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.40	\$86.00
Review case docket, update litigation case notes and identify further action needed.					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$1,358.50
Current Amount Due	\$1,358.50
Previous Balance	\$8,070.70
Payments Received	\$8,070.70
Total Amount Due	\$1,358.50



Invoice Date

12/09/2020

Invoice Number

Mackie Wolf Zientz & Mann, P.C.
 14160 Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: [REDACTED]
 Reference:
 Property Addr: 2812 DEVON DR
 CORPUS CHRISTI, TX 78404
 Our File: 19-000244-671-2

MWZM Case No.: 19-000244-671-2; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

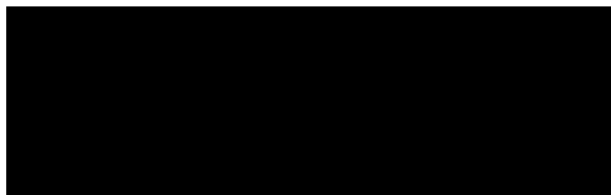
BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
11/30/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.20	\$43.00
Monitor case docket for default judgment.					
12/03/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.20	\$43.00
Receive and review order striking Default Entry as to Theresa Lopez and Order Denying Motion for Default Judgment.					
12/03/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.70	\$150.50
Prepare draft of renewed request for entry of default against Theresa Lopez, declaration in support and proposed entry.					
12/03/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Prepared return of service on Teresa Lopez and Patricia Previty.					
12/04/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Requested military and bankruptcy searches.					
12/04/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review military and bankruptcy search results.					
12/04/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.60	\$57.00
Prepared and redacted exhibits in support of request for default on defendant Theresa Lopez.					
12/04/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Drafted cover letter in support of request for default on defendant Theresa Lopez.					
12/04/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Prepared request for federal filing.					
12/04/2020	Senior Attorney Fee-Hourly-Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review status of service.					

12/07/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.20	\$43.00
Review Entry of Default as to Defendant Theresa Lopez.					
12/07/2020	Associate Attorney Fee-Hourly-Recoverable Lopez, Vivian	Yes	\$215.00	0.60	\$129.00
Finalize Motion for Default Judgment and Proposed Order prior to filing.					
12/07/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Requested military and bankruptcy searches in support of motion for default.					
12/07/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review military and bankruptcy search results.					
12/08/2020	Paralegal Fee-Hourly-Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Receipt and review executed entry of default.					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$698.50
Current Amount Due	\$698.50
Previous Balance	\$9,429.20
Payments Received	\$9,429.20
Total Amount Due	\$698.50



Invoice Date

12/30/2020

Invoice Number

Mackie Wolf Zientz & Mann, P.C.
 14160 Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
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INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

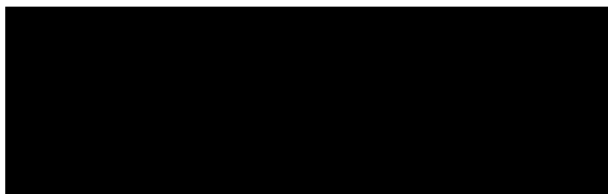
Loan No: [REDACTED]
 Reference:
 Property Addr: 2812 DEVON DR
 CORPUS CHRISTI, TX 78404
 Our File: 19-000244-671-2

MWZM Case No.: 19-000244-671-2; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
12/08/2020	Senior Attorney Fee-Hourly- Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review status of default judgment.					
12/10/2020	Associate Attorney Fee-Hourly- Recoverable Lopez, Vivian	Yes	\$215.00	0.20	\$43.00
Monitor case docket for default judgment.					
12/18/2020	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Attention to completing correspondence regarding pending ruling on judgment.					
12/29/2020	Associate Attorney Fee-Hourly- Recoverable Lopez, Vivian	Yes	\$215.00	0.40	\$86.00
Review case docket for default judgment and update litigation case notes.					

TOTALS	
DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$200.50
Current Amount Due	\$200.50
Previous Balance	\$10,127.70
Payments Received	\$10,127.70
Total Amount Due	\$200.50



Invoice Date

01/08/2021

Invoice Number

Mackie Wolf Zientz & Mann, P.C.
 14160 Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: [REDACTED]
 Reference:
 Property Addr: 2812 DEVON DR
 CORPUS CHRISTI, TX 78404
 Our File: 19-000244-671-2

MWZM Case No.: 19-000244-671-2; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
01/08/2021	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Receipt and review executed order granting final judgment. notified attorney.					
01/08/2021	Associate Attorney Fee-Hourly- Recoverable Lopez, Vivian	Yes	\$215.00	0.30	\$64.50
Receive and review default judgment entered against all Defendants.					
01/08/2021	Associate Attorney Fee-Hourly- Recoverable Lopez, Vivian	Yes	\$215.00	0.40	\$86.00
Draft closing memo keeping the case open until attorney fees are granted.					
01/08/2021	Associate Attorney Fee-Hourly- Recoverable Lopez, Vivian	Yes	\$215.00	1.20	\$258.00
Prepare initial draft of Motion for Attorney's Fees with Declaration in Support and Proposed Order.					
01/08/2021	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.60	\$57.00
Prepared and redacted exhibits in support of Motion for Attorney Fees.					
01/08/2021	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.40	\$38.00
Prepared draft Motion for Attorney fees, Proposed Order prior to filing with the court.					
01/08/2021	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.20	\$19.00
Prepared draft Declaration of Mark .D. Cronenwett in support of the Motion for Attorney Fees.					
01/08/2021	Paralegal Fee-Hourly- Recoverable Alfred, Vanee	Yes	\$95.00	0.30	\$28.50
Prepared correspondence to parties regarding Motion for Attorney Fees					

TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$579.50
Current Amount Due	\$579.50
Payments Received	\$10,328.20



Invoice #: [REDACTED]

Invoice Date: 01/08/2021

Loan No: [REDACTED]

Reference:

Property Addr: 2812 DEVON DR

CORPUS CHRISTI, TX 78404

Our File: 19-000244-671

BILLED CASE SUMMARY SINCE INCEPTION	
FEES	\$0.00
EXPENSES	\$1,643.20
TIME	\$9,264.50
TOTAL	\$10,907.70

Thank you for the opportunity to be of service.

Please contact invoicing@mwzmlaw.com for any questions or concerns regarding items on this invoice.